

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
DEC 12 2012
DAVID J. MALAND, CLERK

UNITED STATES OF AMERICA

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FILED UNDER SEAL

v.

NO. 4:12CR *281*
Judge Schell

THOMAS APPLGATE

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

Count One

Violation: 18 U.S.C. §§ 1955 and 2
(Illegal Gambling Business and Aiding
and Abetting)

Beginning on a date unknown, but no later than on or about June 2009 and continuing until on or about March 2011, in the Eastern District of Texas and elsewhere, the defendant, **Thomas Applegate**, and five or more others known to the United States Attorney, did conduct, finance, manage, supervise, direct, and own all or part of an illegal gambling business, to wit a gambling business involving sports betting, which gambling business was a violation of the laws of the State of Texas to wit, Texas Penal Code §§ 71.02 and 47.03, and which involved five or more persons who conducted, financed, managed, supervised, directed, and owned all or part of the illegal gambling

business, and which remained in substantially continuous operation for a period in excess of thirty days and had a gross revenue of \$2,000.00 in any single day.

In violation of 18 U.S.C. § 1955.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As the result of committing a violation of 18 U.S.C. § 1955 as alleged in this Information, the defendant shall forfeit to the United States of America pursuant to 18 U.S.C. § 982(a)(1)(c) and 28 U.S.C. § 2461 all property, real or personal, involved in the offense or traceable to such property, limited to the following:

Cash Proceeds

1. \$67,198.00 in United States currency seized from Applegate's residence.
2. \$250,000.00 in United States currency.


Property

1. Autographed "Reggie Bush" sports memorabilia picture.
2. Autographed "Reggis Bush" and "Matt Leinart" sports memorabilia picture.
3. Autographed "Kurt Warner" sports memorabilia framed Jersey.

By virtue of the commission of the offense alleged in this Information, any and all interest the defendant has in the above-described property is vested in the United States and hereby forfeited to the United States.

Respectfully submitted,

JOHN M. BALES
UNITED STATES ATTORNEY


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